United States Courts Southern District of Texas

OCT 23 2020

David.

of Court

IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

LAMARR ANTWAIN CAMPBEEL

TDCJ CID NO. 02240984

VS.

BRYAN, COLLIER AND WARDEN R. HERRERA CIVIL ACTION NO ; 20 CV-01115

United States Counts United States Louing Southern FILED OCT 23 2020 David J. Bradley, Clerk of Court

MOTION FOR LEAVE TO FILE AN AMENDED COMPLAINT

Plaintiff LAMARR ANTWAIN CAMPBELL, pursuant to Rule 15(a0 and 19(a) Fed.R.Civ.P. requests Leave the file an Amended Complaint to adding as a party: (1) The Plaintiff in his Original Complaint Name Valentine V. Vrallis No. 4:20-CV.01115 (2) Since the filing Complaint. One of the Defendant Warden R. Herrera did Protect ME[from contracting the Corvanvirsus Covio-19 not On May 25,2020 I, Lamarr Antwain Campbell and the rest of the inmates at the Pack One Trusty Camp all tested Negative, Now about June 6,2020 in the Build of Pack One Unit many of the had been tested Positives, and it got so bad that they could not fine anyone to work in the Pack One Kitchen to prepare the Jonnies Sack Lunches for everyone on the Pack One Unit and Trusty Camp. Nevertheless Warden R, Herrera asked the Pack One for at the Pack One Trusty Camp to Volunteers to some inmates Build to Work after knowingly that there was inmates that had tested Positives with Covio-19 Virus. Moreover after the inmates refused to go to the Build to be infected with the Virus Covio-19. This Act was done Intentionally knowingly that the Volunteers inmates could get infected and infected the rest of the inmates at the Pack One Trusty Camp that had tested Negative Moreover after the inmates refused to go to the Build to be with the Virus Covio-19. infected Warden R. Herrera Threaten

us to give us a Disciplinary Case, Because we refused to go infected with the Covio-19 Voirus. So under section III c.2., and consecutive terms of loss of Privileges without a Discplinary Hearing. The Warden then took our Recreation Privileges. No one could call there family. So some of the inmates thanking If they Volunteer the Warden would give back the Phone Prrivileges they Volunteer and the Volunteer they Brought the Virus back to the Trusty Camp on June 27, 2020 I Lamarr Antwain Campbeel being one of the inmates that the Volunteer gave the Virus to. Here the Plaintiff request Punitive Damages of (300.000) Three Hundred Thousand, Because the wrongful Act that was done intentionally and Maliciously Malice on part of Warden R. Herrera I also request (300.000) Three Hundred Thousand for Compensatory and Monetary Damages for the Long Haul Medical Individualized Treatment Plan.(3) This Court should Grant leave freely to Amended a Complaint see Foman V. Davis 371 U.S. 178.182 (1962).

I declare under penalty of perjury that the foregoing is True and Correct.

Executed on October 22,2020

Signed this the 22, day of October 2020

LAMARR ANTWAIN CAMPBEEL PLANINTIFF.

omarr Campbell #7740984-76-1-010 Wallace Pack One Trusty Cama

.9400 Wallare Dark Rd

TAVAC 77868

NORTH HOUSTON TX 773

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